

# FEDERAL RESERVE BUILDING SITE IMPROVEMENTS AND PERIMETER SECURITY

1709 New York Avenue, NW Washington, DC

Finding of No Significant Impact

## SEP 28 2011

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures, I have evaluated the final site and building plans for site improvements and perimeter security at the Federal Reserve Building, located at 1709 New York Avenue, NW and the July 2011 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) prepared by the Board of Governors of the Federal Reserve ("the Board", "FRB") and have determined that the proposal will not have a significant impact on the human environment.

### Proposed Action

The FRB prepared an EA to analyze the potential environmental impacts that could result from proposed site improvements and perimeter security at the Federal Reserve Building (the Building) located at 1709 New York Avenue, NW. The EA is incorporated by reference into this Finding of No Significant Impact. The EA states that the purpose of the project is to upgrade the level of perimeter security at the Federal Reserve Building. In addition to a No Action Alternative, the EA analyzes two development alternatives described as "Alternative 1" and "Alternative 2." Alternative 2 is identified as the preferred alternative and is the alternative on which NCPC is issuing this FONSI.

Both development alternatives propose the replacement of the existing row of bollards located at the stairway leading to the building's main entrance, and the guard booth and vehicle barrier located near the garage entrance, with a variety of hardened security barriers that meet the Board's desired security rating. The perimeter security plan for both development alternatives is made up of a hardened garden wall, bollards, and a new guard booth and vehicle barrier. These security elements have been integrated into a series of site improvements intended to improve the quality of the building landscape and lessen the visual presence of the physical security along the streetscape. In both alternatives, all site improvements and perimeter security elements are located along the south side of the building fronting on New York Avenue, NW, and are located within public space as the south face of the building is built to the property line.

Alternative 1 replaces the existing bollards, guard booth, and vehicle barrier with a series of hardened security elements including walls, planters, and bollards. This alternative locates the new security elements along the outside edge of the building yard, and does not propose to increase the width of the building yard in any way along the entire south façade of the building. The lawn area to the west of the

entrance stairs, referred to as the "west lawn," would incorporate a hardened security wall interrupted in the middle by a short row of bollards spaced four feet apart. The wall would replace a six-inch curb that currently surrounds the lawn area. To the east of the entrance stairs, a hardened planter would replace an existing plant bed. The side of the planter adjacent to the sidewalk would be placed in the same location as the existing outside edge of the plant bed. To protect the building's main entrance stairs, a new set of bollards would replace those that current exists but maintain the existing curved configuration. At the garage entrance, a new guard booth would be placed in line with the hardened planter. Separating the hardened planter and the guard booth would be a reconfigured handicapped accessible ramp leading from the sidewalk to the building entrance. The width of the ramp at the sidewalk would not require a bollard to be placed in the middle. Finally, a new vehicular barrier would be placed at the back edge of the guard house approximately ten feet from the sidewalk.

Alternative 2, the Preferred Alternative, integrates the perimeter security into a building yard that is widened by eight feet. The additional building yard width is not intended to increase standoff distance but rather will contain landscaping and bench seating intended to help lessen the visual presence of the perimeter security along the streetscape. The security elements included in this alternative consist of a hardened garden wall located along the *existing* outside edge of the building yard and a new row of bollards across the entrance stairway. The majority of the garden wall will be 3'10" high with a slight increase in height in front of the new guard booth. The design of the wall relates to the architecture of the building. It will be clad in gray Indiana limestone and contain a pattern of openings that respond to the spacing of the building's lower level columns. The bollards at the entrance stairway will be placed directly in line with the hardened garden wall. The bollards will be 3'6" in height, 14-inches in diameter and will be clad in metal. The existing garage entrance at the east side of the building will be secured by a new guard booth and vehicle crash barrier. Similar to the garden wall, the guard booth will be clad in gray Indiana limestone. Finally, the new vehicle crash barrier will consist of a typical steel delta, or wedge, system located approximately 25 feet from the sidewalk.

In Alternative 2, the west lawn will contain a refurbished lawn area, landscaping, and public sculpture. Although this area will be located behind the hardened garden wall, the openings in the wall will allow pedestrian access. To the east of the stairway, still behind the garden wall, the existing handicapped accessible ramp will be realigned to open onto the sidewalk. Along both sides of the ramp will be planters containing groundcover and Crape Myrtles. Additional planters containing seasonal plantings are proposed for along both sides of the entrance stairway. Finally, bronze-satin finish light standards are proposed for either side of the stairway. The lights will measure 4-feet in height and be placed atop the proposed garden wall resulting in a total height above grade of approximately eight feet.

#### Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

#### Potential impacts

There will be no significant environmental impacts as a result of the proposed action. The EA analyzed the potential direct, indirect, and cumulative impacts of the project on 23 individual environmental impact topic areas which are listed below:

- Land use
- Farmland
- Social and economic
- Relocation
- Pedestrian and bicycle circulation
- Air quality
- Noise
- Water quality
- Wetlands
- Water body modification and wildlife
- Floodplains
- · Wild and scenic rivers
- Coastal barrier resources

- Coastal zone impacts
- Threatened and endangered species
- Historic and archeological preservation
- Hazardous waste sites
- Visual impacts
- Energy
- Construction
- Traffic
- Short-term uses vs. long-term productivity
- Irreversible and irretrievable commitment of resources

Following the required procedures for analysis, public comment, and response to public comments received, the Board issued a Finding of No Significant Impact (FONSI) for the project on August 12, 2011. NCPC is issuing its FONSI based on the impacts identified for Alternative B.

Of the environmental topic areas analyzed, NCPC's analysis of the EA focused primarily on the potential impacts to pedestrian and bicycle circulation, views, traffic, and historic and archeological preservation. These areas were of particular interest to NCPC given the impacts that perimeter security can have on the integrity of historic features, especially the L'Enfant Plan; on the quality and accessibility of the public realm; and on the circulation patterns of pedestrians, bicycles, and vehicles.

According to the EA, the project has the potential to cause short-term, minor, adverse impacts to pedestrian and bicycle circulation. These impacts would occur as a result of construction related activities associated with the project. The EA states that portions of the sidewalk area adjacent to the project site may be closed to pedestrian traffic for approximately four months. Appropriate safety barriers / fences and signage will be erected to protect the public from construction activities. Upon completion of the project, no long-term adverse impacts to pedestrian and bicycle circulation are anticipated. Although the slight widening of the building yard will result in a slight narrowing of the sidewalk, the resultant sidewalk width will still exceed the District of Columbia's minimum sidewalk width standard for commercial areas. Furthermore, impacts to vehicular traffic are expected to be negligible as the work performed will not require the closure of any travel or parking lanes. Although, the EA notes the possibly of a slight delay in traffic resulting from the loading and unloading of construction materials, this would occur infrequently during the approximate four month construction period and cause only temporary adverse impacts.

With regard to views, the project site currently contains the existing Federal Reserve Building consisting of a multi-story building. The public space in front of the building consists of concrete

sidewalks, landscaped areas, and concrete bollards. The project will improve upon the aesthetic value of the existing perimeter security through a design that complements the architectural expression of the building and by integrating it into the overall building yard improvements which also include additional landscaping, lighting, bench seating, and public art. In addition, the slight widening of the building yard to make it consistent with the building yard to the west will also improve the view by creating a more consistent streetscape condition. Finally, the Federal Reserve has closely coordinated this project with other ongoing and future projects taking place along this section of New York Avenue. These projects include improvements to the exterior and surrounding public space at the United Unions Building, located at the corner of New York Avenue and 18<sup>th</sup> Street, and the future infill development across the street at the Corcoran Gallery of Art. The primary area of coordination among these projects has revolved around the desire to establish a consistent public realm including a consistent sidewalk width, paving material, tree box dimension, and street tree species. As a result, this close coordination has the potential to result in long-term, beneficial cumulative impacts to views along this section of New York Avenue.

According to the EA, the project is not expected to cause any adverse effects to archaeological resources or historic properties. Through the National Historic Preservation Act's Section 106 process, the FRB has worked closely with the District of Columbia State Historic Preservation Officer (DC SHPO) to identify whether the project will have any adverse effects on historic resources currently listed, or eligible to be listed, in the National Register of Historic Places. Several historic resources were identified within the Area of Potential Effect (APE) for the project including: the Lafavette Square and Seventeenth Street Historic Districts; the Northwest Rectangle; the Old Department of the Interior Building; the New Department of the Interior Building; the Corcoran Gallery of Art; the Octagon House; the Eisenhower Executive Office Building and the L'Enfant Plan. Having considered the potential effects of the project, the DC SHPO determined that the project would have no adverse effect on historic properties on the condition that the project be constructed in accordance with the plan shown in the EA, and that, prior to construction, the project "receive review and approval by the District of Columbia Public Space Committee, the National Capital Planning Commission and the United States Commission of Fine Arts (CFA) and obtain all applicable and necessary permits." The DC SHPO further noted that "the design will improve the public space and visually improve upon the present security measures at this location and improve upon the space's contribution to or effects upon the L'Enfant Plan." With regard to the DC SHPO conditions, on July 22, 2011 CFA reviewed and approved the project. In addition, NCPC has confirmed that the project has been fully coordinated with the District of Columbia government, including the Public Space Committee.

Finally, the project will not cause any significant cumulative impacts to any of the environmental topic areas analyzed in the EA when considered together with other past, present, and reasonably foreseeable actions.

Marcel C. Acosta Executive Director